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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 NOETIC SPECIALTY INSURANCE)
9 COMPANY,)
10 Plaintiff,) Case No.: 3:20-cv-00110-LRH-EJY
11 v.)
12 O'MARA LAW FIRM, P.C., a Nevada)
13 Professional Corporation; DAVID O'MARA, a) STIPULATION FOR EXTENSION OF
individual; EDWARD C. WOOLEY and) TIME TO RESPOND TO THE
14 JUDITH WOOLEY, individually and as trustee) COMPLAINT
of the EDWARD C. WOOLEY and JUDITH) (FOURTH REQUEST)
15 WOOLEY INTERVIVOS REVOCABLE)
TRUST 2000; LARRY J. WILLARD,)
individually and as trustee of the LARRY)
16 JAMES WILLARD TRUST FUND;)
OVERLAND DEVELOPMENT)
17 CORPORATION, a California Corporation,)
Defendants.)
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Plaintiff NOETIC SPECIALITY INSURANCE COMPANY, by and through its counsel of record Sheri Thome, Esq., and Defendants O'MARA LAW FIRM, P.C. and DAVID O'MARA (collectively "O'MARA"), by and through their counsel of record, Patrick R. Leverty, Esq., stipulate that O'MARA shall have up to and including **Thursday, August 6, 2020**, to file a stipulation to dismiss this action with prejudice.

Counsel for the O'MARA Defendants signed acceptances of service of process on March 3, 2020 (Doc 16 and 17). Accordingly, the O'MARA Defendants response to the Complaint was originally due on Friday, April 17, 2020.

1 First, Plaintiff agreed Defendant O'MARA could have up to and including May 18, 2020, to
2 respond to the Plaintiff's Complaint. Second, Plaintiff agreed Defendant O'Mara could have up to
3 and including June 1, 2020, to respond to the Complaint. Third, Plaintiff agreed Defendant O'Mara
4 could have up to and including June 22, 2020, to respond to the Complaint.

5 The parties have settled this case and the underlying case. The release has been reviewed and
6 approved by all the parties. The parties are gathering signatures. Once the settlement release is fully
7 executed, the parties will file a stipulation to dismiss this action with prejudice and with each party
8 bearing their fees and costs. The parties anticipate receiving all signatures in the next few days and
9 that a stipulation to dismiss will be filed shortly thereafter, but in order to not burden the Court with
10 another request to extend time, hereby request until **Thursday, August 6, 2020**, to file a stipulation
11 to dismiss.

12 This is the fourth (4th) requested extension.

13 DATED this 22nd day of June, 2020.

14 WILSON, ELSER, MOSKOWITZ,
15 EDELMAN & DICKER LLP

16 /S/ Sheri Thome

17 Sheri Thome, Esq.
18 300 South Fourth Street, 11th Floor
Las Vegas, NV 89101
Attorneys for Plaintiff Noetic Specialty
Insurance Company

DATED this 22nd day of June, 2020.

LEVERTY & ASSOCIATES LAW CHTD.

/S/ Patrick Leverty

Patrick R. Leverty
832 Willow Street
Reno, NV 89502
Attorneys for Defendants O'Mara Law Firm,
P.C. and David O'Mara

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IT IS SO ORDERED:

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UNITED STATES MAGISTRATE JUDGE

DATED: June 23, 2020